

**From:** [Akiva Cohen](#)  
**To:** [Andrew Brettler](#); [Thomas Neville](#)  
**Cc:** [Dylan Schmeyer](#); [Lane Haygood](#); [mjelenchick@nprclaw.com](mailto:mjelenchick@nprclaw.com); [michael@denvertriallawyers.com](mailto:michael@denvertriallawyers.com); [Stephen E. Kravit](#); [litigation staff](#); [Brian T. Fahl](#); [Gaiman](#); [Jake Camara](#); [Kai Alblinger](#)  
**Subject:** Re: Pavlovich v. Gaiman, W.D. Wis. Case No. 3:25-cv-00078-jdp  
**Date:** Tuesday, March 18, 2025 12:08:23 PM

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Andrew,

We'll have a formal letter response back to you shortly. But I note that you did not respond on either our extension request or our request that you agree to shorten the safe harbor time. And, relatedly, we need a two week extension regardless since your motion has required us to engage a New Zealand expert to detail all the errors and misstatements of New Zealand law in your filing. Can you please let me know by noon tomorrow whether you will give us that extension as a normal courtesy, since if you won't we will need to make an opposed motion for an extension?

Separately: I assume Gaiman@kravitlaw.com is a distribution list - if we include it on future emails, do we need to individually add Brian and Stephen? Please let me know - and please include our litigation-staff@kusklaw.com distribution list on future emails.

Thanks,

Akiva

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**From:** Andrew Brettler <abrettler@berkbrettler.com>  
**Sent:** Monday, March 17, 2025 6:16 PM  
**To:** Thomas Neville <tneville@kusklaw.com>  
**Cc:** Dylan Schmeyer <dshmeyer@kusklaw.com>; Akiva Cohen <acohen@kusklaw.com>; Lane Haygood <lhaygood@kusklaw.com>; mjelenchick@nprclaw.com <mjelenchick@nprclaw.com>; michael@denvertriallawyers.com <michael@denvertriallawyers.com>; Lorraine@parkerlipman.com <Lorraine@parkerlipman.com>; Dan@parkerlipman.com <Dan@parkerlipman.com>; Stephen E. Kravit <kravit@kravitlaw.com>; Brian T. Fahl <btf@kravitlaw.com>; Gaiman <Gaiman@kravitlaw.com>; Jake Camara <jcamara@berkbrettler.com>; Kai Alblinger <kalblinger@berkbrettler.com>  
**Subject:** Pavlovich v. Gaiman, W.D. Wis. Case No. 3:25-cv-00078-jdp

Dear Mr. Neville:

Please see the attached correspondence and pleading.

Sincerely,

**Andrew B. Brettler** | BERK BRETTLER LLP  
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